

Paul Flack

From: Paul Flack
Sent: Friday, December 2, 2022 4:47 PM
To: Themeli, Sonila (SHB)
Cc: David Gerger (dgerger@ghmfirm.com); Cooksey, Sharon (SHB)
Subject: RE: SEC v Chavez

Ms. Themeli,

I have spoken to Mauricio and Mr. Poutous. Mauricio is going to bring him the Mercedes at 10 am tomorrow (Saturday) at the address you provided.

I am still working on getting my arms around the situation with the other cars and will be in touch when I know more.

Paul D. Flack
(713) 705-3087

From: Themeli, Sonila (SHB) <STHEMELI@shb.com>
Sent: Friday, December 2, 2022 9:34 AM
To: Paul Flack <pflack@prattflack.com>
Cc: David Gerger (dgerger@ghmfirm.com) <dgerger@ghmfirm.com>; Cooksey, Sharon (SHB) <SCOOKSEY@shb.com>; Themeli, Sonila (SHB) <STHEMELI@shb.com>
Subject: RE: SEC v Chavez

Mr. Flack,

The Receiver will not oppose a motion for a \$14,500 allowance for reasonable attorneys' fees after Mr. Chavez turns over the 4 cars and passwords/credentials for the CFX computers and the other devices we obtained from the CFX offices and which we have requested multiple times. The Receiver will not oppose another \$14,500 allowance for reasonable attorneys' fees after we see some meaningful cooperation from Mr. Chavez.

The four cars, including all keys, titles and other related documents, can be taken at Michael Poutous Auto Sales at 4601 Kelvin Dr., Houston, TX 77005. Please call Mr. Poutous at (713) 791-4203 to let him know when the cars will be there and let me know as well.

The four cars are: 2021 Mercedes Benz GLE AMG, 2022 BMW X6, 2021 Lexus ES 350 and 2021 Volkswagen. I understand that there is a note on the BMW; please send the documentation related to that note as soon as possible.

Also, like with the other counsel involved in this case, going forward, please file a motion with the court for the payment of incurred fees.

Thank you,

Sonila Themeli
Senior Counsel
Shook, Hardy & Bacon L.L.P.

713.546.5656 | sthemeli@shb.com



From: Paul Flack <pflack@prattflack.com>
Sent: Thursday, December 1, 2022 8:22 PM
To: Themeli, Sonila (SHB) <sthemeli@shb.com>
Cc: David Gerger (dgerger@ghmfirm.com) <dgerger@ghmfirm.com>
Subject: RE: SEC v Chavez

EXTERNAL

Also, please let me know asap your position regarding rates and the retainer.

Thank you,

Paul D. Flack
(713) 705-3087

From: Paul Flack
Sent: Thursday, December 1, 2022 8:09 PM
To: Sonila Themeli (sthemeli@shb.com) <sthemeli@shb.com>
Cc: David Gerger (dgerger@ghmfirm.com) <dgerger@ghmfirm.com>
Subject: SEC v Chavez

Ms. Themeli,

I am now representing Mauricio Chavez. I plan to file an appearance and notify the Court of my rate and request a retainer of \$25,000, which would only be half of what you have allowed for Mr. Benvenuto's counsel.

I will then talk with Mr. Chavez about the issues of assets and information you have requested.

Please direct all future communications regarding Mr. Chavez to me.

Thank you,

Paul D. Flack
(713) 705-3087

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